

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

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LIYANAH; GIBRAN ALI RAHARDIAN;	)	
ANINDITA RAHMIANA SEKARINI.,	)	19-cv-05220
	)	Consolidated with
Plaintiffs,	)	<b>18-cv-07686</b>
	)	
v.	)	Judge Thomas M. Durkin
	)	
THE BOEING COMPANY,	)	
	)	
Defendant.	)	
	)	
And	)	
	)	
EPI SAMSUL KOMAR	)	
AND DIAN ANDRIANI,	)	19-cv-05217
	)	Consolidated with
Plaintiffs,	)	<b>18-cv-07686</b>
	)	
v.	)	Judge Thomas M. Durkin
	)	
THE BOEING COMPANY,	)	
	)	
Defendant.	)	

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**DECLARATION OF EDITH R. MATTHAI IN SUPPORT OF OPPOSITION TO  
LIYANAH AND KOMAR PLAINTIFF'S OPPOSED MOTION TO ORDER THEIR  
FORMER COUNSEL TO PRODUCE CLIENT FILES AND EVIDENCE OF EXPRESS  
AUTHORITY TO SETTLE [Docket #870] and COURT ORDER RE SAME [Docket #873]**

**(Filed Under Seal)**

I, EDITH R. MATTHAI, declare:

1. I am a member of the California State Bar in good standing and I have personal knowledge of the matters referred to in this Declaration, and if called upon as a witness, could and would competently testify to the following:
2. My firm represents Mr. Lira in this action. My firm is in the process of reviewing documents in order to produce anything in Mr. Lira's possession related to the Liyanah or Komar

plaintiffs. Review is necessary to ensure that documents and information related to other clients is not produced.

3. My firm has reviewed the hardcopy file materials in Mr. Lira's possession. Responsive documents related to the Liyanah and Komar plaintiffs are being bates-stamped, copied and scanned and will be produced no later than December 23, 2020.

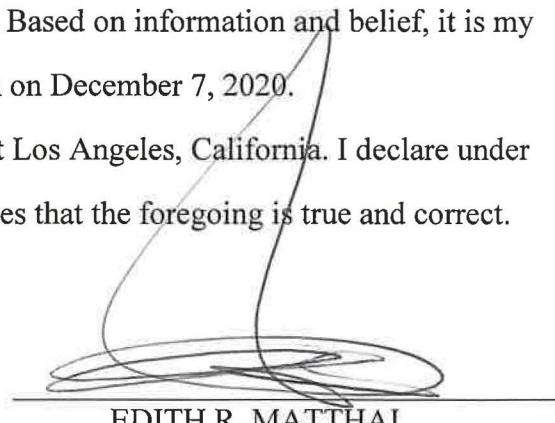
4. My firm has worked with counsel for Johnston Hutchinson & Lira, LLP to pull any potentially responsive emails from their system for review. Potentially responsive emails were pulled at the end of last week and were uploaded to a database for review on December 21, 2020. My office is in the process of reviewing those emails for production. Responsive emails will be produced by Lira by December 30, 2020.

5. Copies of electronic documents related to these clients in Mr. Lira's possession will be produced with the hard copy documents.

6. Attached hereto as Exhibit 1 is a true and correct copy of the December 10, 2020, I sent to Mr. Lubin confirming that Mr. Lira was not asserting a lien of any kind in these cases. It has been redacted because of the attorney client privilege. If the court wishes to see the email in camera it will be produced.

7. Attached hereto as Exhibit 2 is a an email dated December 7, 2020 email from Mr. Sean Kneafsey to Mr. Lubin confirming that neither Mr. Lira nor Johnston, Hutchinson & Lira, LLP have any lien claims, implied or express. Based on information and belief, it is my understanding that this email was sent to Mr. Lubin on December 7, 2020.

Executed this 21<sup>st</sup> day of December, 2020 at Los Angeles, California. I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.



EDITH R. MATTHAI

# EXHIBIT 1

# EXHIBIT 1

**From:** Edith Matthai  
**Sent:** Thursday, December 10, 2020 4:27 PM  
**To:** Peter@L-A.law; monicakelly@ribbecklaw.com  
**Subject:** Lion Air cases

Mr. Lubin,

It was Mr. Lira's understanding from his investigator/translator that [REDACTED]

[REDACTED] Liyanah stated [REDACTED]

[REDACTED] in a Feb. 23, 2020 "whatsapp" sent to the translator. [REDACTED]

Mr. Lira is not aware of any written communication from the Harianto family stating [REDACTED]

[REDACTED] To Mr. Lira's knowledge, the Boeing releases were not signed by either family.

This again confirms that Mr. Lira is not asserting a lien of any kind on these cases. As you know Mr. Lira is no longer with Girardi Keese and cannot speak for that firm.

We presume that Girardi Keese has maintained the client case files.

Regards,

Edith Matthai

Edith R. Matthai  
**ROBIE & MATTHAI**  
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Los Angeles, CA 90071  
213-706-8000  
213-706-9913 (fax)

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## EXHIBIT 2

## EXHIBIT 2

**From:** Sean Kneafsey <skneafsey@kneafseyfirm.com>  
**Sent:** Monday, December 7, 2020 2:00 PM  
**To:** Peter Lubin  
**Cc:** Monica Wood-Prince  
**Subject:** RE: Representation of Johnston & Hutchinson & David Lira

Dear Mr. Lubin:

Regarding the issue of any lien claims, I am writing to confirm that that neither Johnston Hutchinson & Lira, LLP nor David Lira, individually, have any lien claims at all, implied or express. David Lira left the employment of the Girardi firm in June of 2020 and Johnston Hutchinson & Lira LLP has never represented any of your clients.

Mr. Lira will likely be retaining separate counsel who can separately address your claims. I will be representing the firm.

Sean Kneafsey

**SEAN M. KNEAFSEY** | The Kneafsey Firm, Inc. | 800 Wilshire Blvd., Suite 710 | Los Angeles, CA 90017  
Phone 213-892-1200 | Fax 213-892-1208 | [skneafsey@kneafseyfirm.com](mailto:skneafsey@kneafseyfirm.com)

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[REDACTED]

[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]

[REDACTED]

**CERTIFICATE OF SERVICE**

I, Edith R. Matthai, the undersigned attorney, hereby certify that on December 21, 2020, I served a true and correct copy of the foregoing Declaration Of Edith R. Matthai In Support of Opposition To Liyanah And Komar Plaintiff's Opposed Motion To Order Their Former Counsel To Produce Client Files And Evidence Of Express Authority To Settle [Docket #870] and Court Order Re Same [Docket #873] upon all counsel of record via the Court's CM/ECF System.

/s/Edith R. Matthai